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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W.A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the TRUSTEE)
FOR NATURAL RESOURCES FOR THE)
STATE OF OKLAHOMA,)
Plaintiff,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al.,)
Defendants.)

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VIDEO DEPOSITION OF JOHN LITTLEFIELD,
produced as a witness on behalf of the Defendants in
the above styled and numbered cause, taken on the
2nd day of August, 2007, in the City of Tulsa,
County of Tulsa, State of Oklahoma, before me, Karla
E. Barrow, a Certified Shorthand Reporter, duly
certified under and by virtue of the laws of the
State of Oklahoma.

1		A P P E A R A N C E S
2	FOR THE PLAINTIFF:	MR. ROBERT A. NANCE
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12	FOR CARGILL:	MS. THERESA NOBLE HILL
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17		and
18	FOR SIMMONS FOODS:	MR. JOHN TUCKER (phone)
19		MR. JOHN ELROD
20		MS. VICKI BRONSON (phone)
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FOR ODAFF:

MS. JANET STEWART
Attorney at Law
2800 N. Lincoln Boulevard
Oklahoma City, OK 73152

1 MR. BROWN: David Brown for Willow Brook.

2 MS. BRONSON: Vicki Bronson for Simmons.

3 VIDEOGRAPHER: Thank you. You can swear
4 the witness.

5 JOHN LITTLEFIELD,
6 being first duly sworn to tell the truth, the whole
7 truth and nothing but the truth, testified as
8 follows:

9 DIRECT EXAMINATION

10 BY MR. ELROD:

11 Q Mr. Littlefield, my name is John Elrod. I
12 represent Simmons Foods in this matter, and I'm
13 going to have a few questions for you. We've not
14 met before today, have we, sir?

15 A No, sir.

16 Q And would you tell me what your name and
17 address is for the record?

18 A John L. Littlefield, 38327 South 4370 Road,
19 Adair, Oklahoma 74330.

20 Q How long have you lived in Adair?

21 A Approximately two years at that place.

22 Q All right, sir. Are you a high school
23 graduate?

24 A Yes.

25 Q What town and what year?

1 question, and I do understand what you said, sir,
2 that you're not -- but if you say that following an
3 animal waste management plan is not all there is to
4 protecting the natural resources of the State, I
5 don't understand what else there is unless you can
6 tell me.

7 **A** I guess I was confused about it, you know, and
8 maybe I still am, I don't know, but I think that the
9 animal waste management plan is designed to protect
10 just, as it says here, the natural resources. So if
11 they follow that, and correctly, it would -- it
12 should protect the natural resources.

13 **Q** Okay. Thank you. Now I understand what
14 you're saying. As the compliance inspector for the
15 State of Oklahoma, is it your view that if a poultry
16 applicator follows the animal waste management plan
17 related to the application site, that that person is
18 complying with Oklahoma law?

19 **A** Yes.

20 **Q** Okay. Now, the people who write these animal
21 waste management plans, they also have to be
22 approved in some fashion by the Department of
23 Agriculture or ODAFF?

24 **A** Yes, that's in the State law.

25 **Q** Okay. In other words, you just can't get --